

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: STEVEN HOLLENHEAD
Debtor**

**CASE NO. 13-13089
CHAPTER 13**

**CREDITOR, NU-WAY OF MISSISSIPPI, INC.
d/b/a NU-WAY CASH AND CARRY**

OBJECTION/RESPONSE TO DEBTOR'S MOTION TO AVOID A JUDGMENT LIEN

COMES NOW, C. Hays Burchfield, attorney for Creditor Nu-Way of Mississippi, Inc. d/b/a Nu-Way Cash and Carry, in response to the Motion to Avoid a Judgment Lien in the above-captioned cause, and respectfully moves that this Court deny and dismiss Debtor's motion, and as support shows the Court as follows:

On June 13, 2012, Creditor obtained a judgment against Steven Hollenhead, Debtor, in the Circuit Court of Webster County, Mississippi (2012-38-CVM), in the amount of \$27,606.56 plus interest accruing at the rate of eight percent per annum. The judgment was based on building materials Debtor received from Creditor and used on different people's homes that the Debtor never paid for after he finished building other people's houses.

Debtor cites Mississippi Code Section 85-3-21 as basis for exemption from this Circuit Court Judgment and seeks an order avoiding judgment lien in this Court because there is a \$75,000.00 homestead exemption amount. Creditor is not seeking to take Debtor's house, so 85-3-21 does not apply. Therefore, Creditor respectfully requests that this Court deny Debtor's motion and not grant any of the relief requested in Debtor's Motion.

Respectfully submitted,

Nu-Way of Mississippi, Inc. d/b/a Nu-Way Cash and Carry

A handwritten signature in black ink, appearing to read "C. Hays Burchfield".

C. HAYS BURCHFIELD, MS Bar No. 103680

Attorney at Law

P.O. Box 733, 124 N. Dunn Street, Eupora, MS 39744

Phone & Fax: (662) 258-6633 E-mail: haysburchfield@gmail.com

Attorney for Nu-Way of Mississippi, Inc. d/b/a Nu-Way Cash and Carry

CERTIFICATE OF SERVICE

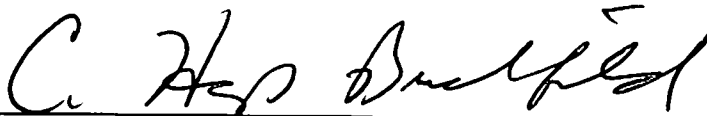
I, C. Hays Burchfield, attorney for the Creditor, Nu-Way of Mississippi, Inc., d/b/a Nu-Way Cash and Carry, do hereby certify that I have this day mailed a correct copy of the foregoing Objection/Response to Debtor's Motion to Avoid Judgment Lien by either e-mail or U.S. Mail, postage prepaid, to:

Hon. William C. Cunningham, Attorney for Debtor, at P.O. Box 624, Columbus, MS 39703,
wccsinc@gmail.com

Terre M. Vardaman, Chapter 13 Trustee
Vardaman13@gmail.com

Office of the U.S. Trustee
USTPRegion.05.AB.ECF@usdoj.gov

So Certified: This the 20th day of August, 2013.



C. HAYS BURCHFIELD, MS Bar No. 103680
Attorney at Law
P.O. Box 733, 124 N. Dunn Street, Eupora, MS 39744
Phone & Fax: (662) 258-6633 E-mail: haysburchfield@gmail.com
Attorney for Nu-Way of Mississippi, Inc. d/b/a Nu-Way Cash and Carry